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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of

Truth-in-Billing and
Billing Format

CC Docket No. 98-170

**COMMENTS OF ROSEVILLE TELEPHONE COMPANY
REGARDING OMB CONTROL NO. 3060-0854**

Roseville Telephone Company (hereinafter "Roseville") hereby submits its comments on the information collection requirements proposed in the Truth-In-Billing Order adopted by the Commission (the "TIB Order").¹ Roseville is a mid-sized incumbent local exchange carrier located in Roseville, California. Implementation of the TIB Order should not begin until after April 2000.

The Requirements of the TIB Order Are Onerous and Burdensome

Roseville has already made extensive changes to its information technology processes to ensure the clarity of all bills rendered to customers. The TIB Order would require Roseville and all other carriers to make significant additional changes to their billing systems to implement the new Truth-in-Billing requirements. For example, the TIB Order would include a new "service provider highlighting" requirement (47 C.F.R. § 64.2001 (a)(2)(ii)) and a new

¹ Truth-in-Billing and Billing Format, CC Dkt. No. 98-170, First Report and Order and Further Notice of Proposed Rulemaking (released May 11, 1999) (hereinafter the "TIB Order").

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“deniable/non-deniable” requirement (47 C.F.R. § 64.2001 (c)). Roseville has not, at this time, estimated the cost of implementing these changes, due to its limited resources and the time frame allowed for preparing and submitting comments. Nevertheless, based on cost estimates already submitted by others in this proceeding, it is undeniable that these costs will be very significant.

In addition, implementation of the changes needed to fulfill these new requirements will be complicated by ongoing regulatory uncertainty as to their implementation date due to the pending FPRM and Petitions For Reconsideration before the Commission. Additional requirements might be adopted by the FCC in this ongoing proceeding. It would be sensible for the Commission to complete this proceeding before requiring implementation of TIB requirements which might be modified by future orders, especially in light of the need for telephone companies to devote their resources to resolution of the Y2K issues.

Implementing the TIB Order Now Could Jeopardize Efforts Addressing Y2K Issues

Y2K concerns raised throughout each phase of this proceeding and raised recently by the White House, generally about the telecommunications industry’s Y2K status, pose an important question about the implementation timing contained in the TIB Order. In December 1998, OMB recommended that the Commission allow companies sufficient time to address their necessary Year 2000-related modifications to their computer systems as well as modifying their billing systems to meet any new requirements.²

² See, TIB Order at ¶ 76.

The FCC's "Y2K Communications Sector Report" released on March 30, 1999 noted concern with the progress of the small and mid-size LECs Y2K preparations. Roseville understands that the White House' information hotline, operated by the President's Council on Year 2000 Conversion, also has expressed concern about the status of small and mid-size LECs' Y2K remediation efforts. The TIB Order, however, fails to acknowledge the extreme burden that would be caused by requiring Roseville and other carriers to implement the TIB Order at the same time as they are working to ensure proper operations during the Y2K period (June 1999 to April 2000). Like other carriers, Roseville is currently applying its resources to ensure that its systems and network are Y2K compliant. Information technology personnel not directly assigned to Y2K are being used to manage normal day to day operations and to accommodate other requirements already mandated by state and federal regulatory authorities. Roseville would have an extremely difficult time also implementing the TIB Order before the end of the Y2K period.

At this time, Roseville believes that it is substantially Y2K compliant. Roseville must still continue, however, to devote its limited resources to the remaining Y2K compliance efforts. Roseville's Y2K preparations have now reached the "chill and freeze" point, meaning that during September and October, any and all system changes must be minimized, while ensuring completion of those changes already underway. During November and December, all systems and processes must be "frozen" to allow resources to be dedicated to addressing any "eleventh hour" Y2K issues that are almost certain to occur. If system modifications necessary for TIB implementation were to occur during this period, Y2K compliance could be jeopardized.

For the reasons cited above, the Commission should not divert carriers from devoting their limited resources to Y2K compliance. TIB implementation should be deferred until after the Y2K period. The FCC should, therefore, hold further TIB implementation requirements in abeyance until April 2000.

Dated this twenty-seventh day of August 1999 at San Francisco, California.

Respectfully submitted,

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